



State of New Jersey

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Remedial Project Manager
USEPA Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

April 28, 2015

Re: L. E. Carpenter (LE)
Wharton, Morris County, New Jersey
SRP PI# 003017

Dear Ms. Simmons-Pierre:

The New Jersey Department of Environmental Protection (Department) has completed a review of the Second Semiannual Monitoring Report 2014 dated January 2015, submitted pursuant to CERCLA and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (Tech Rules).

The Department's comments on the submittal are provided below.

The Department agrees that additional evaluation of DEHP in Rockaway River sediment is warranted to evaluate potential impacts to the environment. It was noted that DEHP in surface water sample SW-R1 (2.9 ppb) exceeded the New Jersey Surface Water Quality Criteria (NJSWQC) of 0.95 ppb (p. 1-2).

Page 5-4 – "TRC proposes to conduct an ecological evaluation of DEHP in Rockaway River sediments." It must be noted that the correct evaluation to be conducted is a Baseline Ecological Risk Assessment (BERA) in accordance with the most recent edition of the Department's *Ecological Evaluation Technical Guidance*.

As previously stated by the Department, pore water (and ground water samples adjacent to the river) must be evaluated against the NJSWQC, not the Ground Water Quality Criteria (GWQC) (p. 4-7). The results of all potentially affected samples (pore water, groundwater, and surface water) must be re-checked, including those that may have been omitted from figures because they were below the GWQC (e.g., sample SW-D-5 in 3Q14, see page 7 of 52 in Appendix B vs Figure 5A). To reiterate, the technical basis for evaluating groundwater and pore water data against FW2 SWQC can be found in Sections 5.4 and 6.2.3 of the Department's August 2012 *Ecological Evaluation Technical Guidance*. The entire document may be found at http://www.nj.gov/dep/srp/guidance/sra/ecological_evaluation.pdf. The human health-based SWQC for DEHP is 1.2 ppb and the ecologically-based SWQC for DEHP is 0.3 ppb.

The text on page 5-3 and Table 9 show the concentration of DEHP as 1.6 ppm, but Figure 8 shows the concentration as 1,600 ppm. Please correct the discrepancy.

Table 7 – See comment paragraph 3, above.

Data qualifiers outlined in Appendix B indicate that sample results from 3Q14 may be biased low or high



due to factors such as unpreserved VOC samples, low surrogate recoveries, or potential false positives. These potential issues need to be considered in the overall evaluation.

The Department disagrees with the report conclusion that ground water contamination in the wetlands area has been delineated. The Department has previously stated that ground water contamination in the wetlands has not been horizontally or vertically delineated. The reasons for this assessment are as follows:

- MW-35s exceeds the GWQS for bis(2-ethylhexyl)phthalate (DEHP) with a concentration of 2,000 ppb. The temporary wells installed downgradient and south of MW-35s towards the Rockaway River (i.e. TW-35-6, TW-35-7 and TW-35-8) did not produce enough water volume to allow for sampling.
- A component of ground water in the wetlands area also flows toward the drainage channel located to the north of the wetlands. Temporary well TW-35-1, located near the drainage ditch, did not produce enough water volume to allow for the taking of a sample.
- Temporary wells, according to Table 6, were driven between 1 and 3 feet below ground surface. For those wells that were able to be sampled (i.e. TW-35-2, TW-35-3, TW-35-4, TW-35-9), no vertical profiling was conducted.

Due to the apparent difficulty in installing and obtaining ground water samples from temporary wells the Department recommends that future ground water investigations in the wetlands area include the installation of monitoring wells for contaminant delineation.

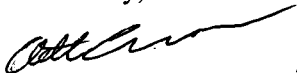
It must be confirmed that the site's permanent monitoring wells in the wetlands area have been vertically profiled.

The pilot scale phytoremediation system was installed in March 2013. A report that provides an evaluation of the pilot study needs to be submitted.

Please incorporate these comments into the letter that the USEPA will be sending to L.E. Carpenter.

If you have any questions regarding this matter I may be contacted at (609) 633-1416, or at Anthony.Cinque@dep.state.nj.us.

Sincerely,



Anthony Cinque, Case Manager
Bureau of Case Management

cc: Steve Byrnes, NJDEP/BEERA
Daryl Clark, NJDEP/BGWPA